

EXHIBIT T

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,)
)
 Plaintiff,)
)
 vs.) NO. 3:17-CV-05806-RJB
)
)
)
 Defendant.)

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF TAYLOR WONHOFF

APPEARANCES:

FOR THE PLAINTIFF: MS. ANDREA BRENNEKE
 ASSISTANT ATTORNEY GENERAL
 800 Fifth Avenue, Ste. 2000
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FOR THE DEFENDANT: MS. JOAN MELL
 III Branches Law
 1019 Regents Blvd., Suite 204
 Fircrest, WA 98466

MS. ASHLEY E. CALHOUN
AKERMAN, LLP
1900 Sixteenth Street
Suite 1700
Denver, CO 80202

ALSO PRESENT: DAVE HANSEN, VIDEOGRAPHER

Thursday, August 22, 2019
Olympia, Washington

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STATE OF WASHINGTON vs GEO GROUP
 Taylor Wonhoff, 08/22/2019

1	I N D E X		
2	EXAMINATION		
3	MS . MELL	5	4
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10	E X H I B I T I N D E X		
11	EXHIBIT NO.	DESCRIPTION	PAGE/LINE
12	NO. 261	Notice of 30(b)(6) Deposition; 10 pgs.	164 17
13	NO. 262	Document entitled Statement of Interest of the United States; 18 pgs.	90 20
14	NO. 263	Compilation of E-mail; 13 pgs.	92 7
15	NO. 264	Compilation of e-mails; 2 pgs.	106 11
16	NO. 265	Compilation of e-mails; 3 pgs.	123 25
17	NO. 266	Compilation of e-mails; 5 pgs.	133 17
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2	NO. 273	Compilation of e-mails; 2 pgs.	145	25
3	NO. 274	Compilation of e-mails; 7 pgs.	147	13
4	NO. 275	Compilation of e-mails; 4 pgs.	149	17
5	NO. 276	Compilation of e-mails; 1 pg.	150	4
6	NO. 277	Final Bill Report, SJR 8212; 2 pgs.	152	5
7	NO. 278	Copy of Washington State Constitution, Section 29, Convict Labor; 1 pg.	154	23
8	NO. 279	Report of Washington Inmate Labor Programs, SJR 8212 (2007); 2 pgs.	158	2
9	NO. 280	Copy of article from Seattle PI entitled P-I Endorsement: Smarter prisoners; 2 pgs.	158	22
10	NO. 281	Copy of Senate Joint Resolution 8212; 3 pgs.	159	12
11	NO. 282	Copy of Class Action Complaint; 20 pgs.	160	2
12	NO. 283	Arguments in support of SJR 8212 in Washington 2007 Voters Guide; 1 pg.	161	22
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1 BE IT REMEMBERED that on Thursday, August 22,
2 2019, at 10:24 a.m. at 1125 Washington Street SE, Olympia,
3 Washington, before DIXIE J. CATTELL, Certified Court
4 Reporter, appeared TAYLOR WONHOFF, the witness herein;
5 WHEREUPON, the following proceedings were had,
6 to wit:

7

8

9

10 THE VIDEOGRAPHER: This is a video-recorded
11 30(b)(6) deposition. Today's date is August 22, 2019. The
12 time is 10:24.

13 My name is Dave Hansen. I'm subcontracted by Sound
14 Vision Video Production, 4821 North 14th Street, Tacoma,
15 Washington, 98406; phone number, (253) 905-4941. The
16 deposition today is being held at 1125 Washington Street in
17 Olympia, Washington. The case is State of Washington
18 versus the GEO Group.

19 Present for the plaintiff is Andrea Brenneke.

20 Present for the defense is Joan Mell. The witness is
21 Taylor Wonhoff.

22 The court reporter, Dixie Cattell, will now swear in
23 the witness.

24 | * * *

25 | * * *

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1 TAYLOR WONHOFF, having been first duly sworn,
2
3 testified as follows:

3 EXAMINATION

4 BY MS. MELL:

5 Q State your name.

6 A **Taylor Wonhoff, W-O-N-H-O-F-F.**

7 Q What's your position?

8 A **I am the Governor's deputy general counsel.**

9 Q How long have you been the Governor's deputy counsel?

10 A **I have been in that role since January of 2014.**

11 Q Who's the Governor?

12 A **Jay Inslee.**

13 Q How long has he been Governor?

14 A **Governor Inslee has been in office since January 16, 2013.**

15 Q What do you do in your position as deputy general counsel
16 for Governor Jay Inslee?

17 A **As a member of the Governor's Office of General Counsel, I
18 provide legal advice to the Governor and his staff on a
19 range of matters. My portfolio includes clemency, public
20 records, administrative appeals, judicial appointments, and
21 a range of other matters.**

22 Q Do you sit with him on any executive regular meetings with
23 his appointees, his department appointees?

24 MS. BRENNKE: Object to the form.

25 A **I do not regularly sit in on executive team meetings or in**

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1 don't know what the -- I'm trying to make sure I understand
2 how you're answering. Is it because there's been no
3 conversation, or are you recalling an
4 Office-of-the-Governor-type conversation about cost of
5 confinement and how they're covered?

6 MS. BRENNKE: Object to the form of the
7 question. Beyond the scope of the 30(b) (6) deposition.

8 **A I cannot recall any conversations that relate to**
9 **incarcerated individuals covering the cost of their**
10 **confinement at the detention center, at the Northwest**
11 **Detention Center.**

12 Q (By Ms. Mell) Do you recall any conversations about
13 detained individuals in the state of Washington covering
14 the cost of their confinement?

15 MS. BRENNKE: Same objection.

16 **A It is my understanding that it's -- that the work that**
17 **individuals in state detention facilities are doing is not**
18 **necessarily to offset the costs of their incarceration, but**
19 **is done for them to build their skills, to rehabilitate,**
20 **to -- to, I don't know, address idleness, give them**
21 **something to do, rather than to cover the costs of their**
22 **incarceration.**

23 Q (By Ms. Mell) Okay. So idleness is an objective to work
24 by detainees?

25 **A Yes.**

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1 C E R T I F I C A T E

2 I, DIXIE J. CATTELL, the undersigned Registered
3 Professional Reporter and Washington Certified Court Reporter,
4 do hereby certify:

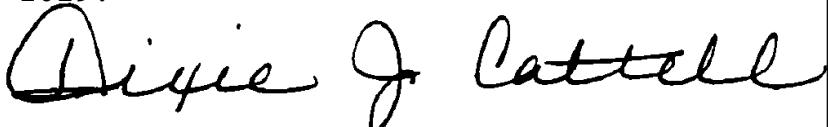
5 That the foregoing deposition of TAYLOR WONHOFF was
6 taken before me and completed on the 22nd day of August, 2019,
7 and thereafter transcribed by me by means of computer-aided
8 transcription; that the deposition is a full, true and
9 complete transcript of the testimony of said witness;

10 That the witness, before examination, was, by me,
11 duly sworn to testify the truth, the whole truth, and nothing
12 but the truth, and that the witness reserved signature;

13 That I am not a relative, employee, attorney or
14 counsel of any party to this action or relative or employee of
15 such attorney or counsel, and I am not financially interested
16 in the said action or the outcome thereof;

17 That I am herewith securely sealing the deposition of
18 TAYLOR WONHOFF and promptly serving the same upon MS. JOAN
19 MELL.

20 IN WITNESS HEREOF, I have hereunto set my hand this
21 26th day of AUGUST, 2019.

22 
23

24 Dixie J. Cattell, RPR, CCR
25 NCRA Registered Professional Reporter
Washington Certified Court Reporter CSR#2346